

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

FILED  
JUN - 4 2020  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
YOUNGSTOWN

BRETT M. MCCLAFFERTY,

Plaintiff

-vs-

PORTAGE COUNTY BOARD OF  
COMMISSIONERS, et al.

Defendants

CASE NO.: 5:19-cv-02219-BYP

HON. JUDGE BENITA Y. PEARSON

MAG. JUDGE GEORGE J. LIMBERT

---

REQUEST FOR COURT TO TAKE JUDICIAL NOTICE  
OF PUBLIC RECORDS AND FEDERAL COMPLAINT

---

Now comes Plaintiff, Brett M. McClafferty, who respectfully requests that this Honorable Court take judicial notice of the attached public record; a filing in Portage Co. Common Pleas Court case no. 2019 CV 00960, State of Ohio ex rel. Amanda Griffiths, et al. v. Portage County Board of Commissioners, which contains dozens of certified complaints and/or affidavits of former Portage County Jail inmates alleging substantially similar abuses and violations of law to that alleged in the instant Complaint.

This public record helps establish a pattern of violative behavior by Defendants, necessary to pierce qualified immunity, as required by the U.S. Supreme Court in relation to 42 U.S.C. 1983 claims.

For the same reasons, Plaintiff also requests that this Court take notice of the complaint filed in U.S. District Court case no. 5:14-cv-01272-BYP, Anderson v. Sutton, which previously came before this very Court.

Respectfully Submitted,



BRETT M. MCCLAFFERTY (750839)  
Plaintiff, Pro Se Litigant  
c/o CoreCivic  
501 Thompson Road  
Conneaut, Ohio 44030

CERTIFICATE OF SERVICE

I, Brett M. McClafferty, do hereby certify that I requested that true and accurate copies of the foregoing be served upon counsel for all Defendants via electronic service of the Clerk of the U.S. District Court for the Northern District of Ohio, this 29th day of May, 2020.



BRETT M. MCCLAFFERTY (750839)  
Plaintiff, Pro Se Litigant

INSTRUCTIONS TO THE CLERK

May 29th, 2020

Please provide electronic service of the foregoing to counsel for all Defendants in the associated case.

Plaintiff has been granted permission to proceed In Forma Pauperis, and cannot perfect service independently at this time due to financial constraints associated with incarceration.

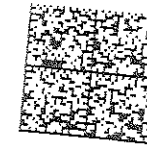
I truly thank you for your time and assistance.

Very Truly Yours,

A handwritten signature in black ink, appearing to read 'Brett M. McClafferty', is written over a horizontal line.

BRETT M. MCCLAFFERTY (750839)  
Plaintiff, Pro Se Litigant

Beaumont, Ohio (VPO)  
c/o Coe Clinic  
801 Thompson Rd.  
Conneaut, Ohio  
44030



US POSTAGE  
\$ 08.25  
Priority Mail  
Mailed From 44030  
06/01/2020  
032A 0061846619

Office of the Clerk  
United States District Court  
125 Market St, Room 337  
Youngstown, Ohio  
44503-1787

LAKE ERIE CORRECTIONAL  
INMATE CORRESPONDENCE